

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Criminal No.
v.	:	
	:	18 U.S.C. §§ 1341,
	:	1344 & 2
JARED DULLUM	:	
	:	<u>I N D I C T M E N T</u>

The Grand Jury in and for the District of New Jersey,
sitting in Newark, charges:

COUNT 1

1. At all times relevant to this indictment:

a. Defendant JARED DULLUM was employed as a Special Agent with the United States Secret Service in New York, New York, and received training on banking practices and procedures, as well as fraud detection. Defendant JARED DULLUM was also the trustee over the assets of an individual identified as J.A.D., who died on or about January 16, 2005.

b. Defendant JARED DULLUM maintained and controlled a checking account in the name of the estate of J.A.D. at Washington Mutual Bank (the "J.A.D. Estate Account"), which was opened by him on or about March 11, 2005.

c. I.E. Shaffer & Co. ("I.E. Shaffer") was a pension fund plan administrator responsible for managing group plans, including the pension fund plan for Plumbers Local 24 (the

"Plumbers' Union"). J.A.D. was a beneficiary of the Plumbers' Union pension fund plan.

2. From at least as early as in or about January 2005, through in or about April 2005, in Monmouth County, in the District of New Jersey and elsewhere, defendant

JARED DULLUM

did knowingly and willfully devise and intend to devise a scheme and artifice to defraud the Plumbers Local 24 pension fund and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice was in substance as set forth below.

3. It was part of the scheme and artifice that in or about January 2005, defendant JARED DULLUM forged the signature of J.A.D. on a will in J.A.D.'s name that was dated July 20, 2004, purporting to make defendant JARED DULLUM the executor of J.A.D.'s estate ("J.A.D.'s Forged Will").

4. It was further part of the scheme and artifice that on or about January 18, 2005 defendant JARED DULLUM contacted I.E. Shaffer to notify the pension fund administrator that J.A.D. had passed away on January 16, 2005.

5. It was further part of the scheme and artifice that on or about March 11, 2005, defendant JARED DULLUM sent a letter to I.E. Shaffer, representing himself to be the executor of J.A.D.'s estate, as well as a copy of J.A.D.'s Forged Will, in support of his request that I.E. Shaffer forward to him the

remainder of J.A.D.'s share of her Plumbers' Union pension fund benefits.

6. It was further part of the scheme and artifice that on or about April 4, 2005, defendant JARED DULLUM deposited into the J.A.D. Estate Account a check issued by the Plumbers' Union and made payable to the estate of J.A.D. in the amount of \$29,253.76, representing a lump sum payment of J.A.D.'s remaining pension fund benefits (the "April 4, 2005 Check").

7. It was further part of the scheme and artifice that defendant JARED DULLUM diverted the funds from the J.A.D. Estate Account for his personal benefit in the month following the deposit of the April 4, 2005 Check.

8. On or about March 15, 2005, for the purpose of executing the above scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, defendant

JARED DULLUM

did knowingly and willfully cause to be placed in a post office and authorized depository for mail to be delivered by the United States Postal Service certain mail matter, namely a letter addressed to the Estate of J.A.D., c/o Jared Dullum in Eatontown, New Jersey, from I.E. Shaffer confirming the future delivery of a check in the amount of \$29,253.76, representing the remainder of J.A.D.'s Plumbers' Union pension fund benefits.

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNT 2

1. The allegations contained in Paragraph 1 of Count 1 are realleged and incorporated herein.

2. At all times relevant to this Indictment:

a. Defendant JARED DULLUM was issued credentials by the United States Secret Service identifying him as a Special Agent (the "Secret Service Credentials").

b. Washington Mutual Bank was a financial institution, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation.

3. From in or about May 2005 through in or about June 2005, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

JARED DULLUM

did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud Washington Mutual Bank and to obtain moneys, funds, and assets owned by and under the custody and control of Washington Mutual Bank by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice was in substance as set forth below.

4. It was part of the scheme and artifice to defraud that on or about June 2, 2005 defendant JARED DULLUM received from an individual identified as T.W. a check which defendant JARED DULLUM knew to be counterfeit, which check was dated May

26, 2005 in the amount of \$10,500.87 and drawn on the account of F.M. (the "May 26, 2005 Check").

5. It was further part of the scheme and artifice that on or about June 7, 2005 defendant JARED DULLUM showed his Secret Service Credentials to a Washington Mutual Bank employee in order to negotiate the May 26, 2005 Check, withdraw \$500 in cash, and deposit the remaining \$10,000.87 into the J.A.D. Estate Account.

6. It was further part of the scheme and artifice that defendant JARED DULLUM diverted the funds from the J.A.D. Estate Account for his personal benefit in the week following the deposit of the May 26, 2005 Check.

7. It was part of the scheme and artifice to defraud that on or about June 14, 2005 defendant JARED DULLUM received from an individual identified as T.W. a check which defendant JARED DULLUM knew to be counterfeit, which check was dated June 8, 2005 in the amount of \$10,000.35 and drawn on the account of F.M. (the "June 8, 2005 Check").

8. It was further part of the scheme and artifice that on or about June 14, 2005 defendant JARED DULLUM deposited the June 8, 2005 Check into the J.A.D. Estate Account.

9. It was further part of the scheme and artifice that defendant JARED DULLUM diverted the funds from the J.A.D. Estate Account for his personal benefit in the week following the deposit of the June 8, 2005 check.

In violation of Title 18 United States Code, Sections 1344 and 2.

A TRUE BILL

FOREPERSON

CHRISTOPHER J. CHRISTIE
United States Attorney